

**REMARKS**

In the non-final Office Action, the Examiner rejects claims 1-18 under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 6,718,333 to Matsuda (hereinafter "MATSUDA"). Applicants respectfully traverse this rejection.<sup>1</sup>

By way of this Amendment, Applicants amend claims 2-6, 9-12, 14-16, and 18 to improve form and add new dependent claims 19 and 20. No new matter has been added by the amendment. Claims 1-7, 9-12, and 14-20 are pending.

Pending claims 1-7, 9-12, and 14-18 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by MATSUDA. Applicants respectfully traverse this rejection.

A proper rejection under 35 U.S.C. § 102 requires that a reference teach every aspect of the claimed invention. Any feature not directly taught must be inherently present. See M.P.E.P. § 2131. MATSUDA does not disclose the combination of features recited in Applicant's claims 1-7, 9-12, and 14-18.

Independent claim 1 is directed to a method that includes receiving a first uniform resource locator (URL) including one or more parameters, retrieving content corresponding to the first URL, retrieving content corresponding to a plurality of URLs having different parameter combinations of the one or more parameters, identifying a parameter combination from the plurality of URLs that corresponds to content that is approximately the same as the content corresponding to the first URL, and generating one

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<sup>1</sup> As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, reasons for modifying a reference and/or to combine references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

or more URL rewrite rules based on the identified parameter combination. MATSUDA does not disclose or suggest this combination of features.

For example, MATSUDA does not disclose or suggest identifying a parameter combination from the plurality of URLs that corresponds to content that is approximately the same as the content corresponding to the first URL, as recited in claim 1. The Examiner relies on col. 2, lines 43-59 of MATSUDA for allegedly disclosing this feature (Office Action, p. 2). Applicants disagree with the Examiner's interpretation of MATSUDA.

Col. 2, lines 43-59 of MATSUDA disclose:

In another aspect of the present invention, the structured document search system using the structured document classification device, comprises: a input/output device for inputting a search parameter and a type of a target structured document and for outputting search results; a search engine for performing a search in a database storing structured documents by the input search parameter; a type searcher for searching for the relevance to the input type found by the search engine, the relevance being calculated by the structured document classification device; and a restrictor for receiving the search results from the search engine, receiving the relevance of the structured document found by the type searcher, restricting the search results by consulting the relevance to the input type, and outputting the narrowed search results to the input/output device.

This section of MATSUDA discloses a structured document search system that includes an input/output device, a search engine, a type searcher that uses a structured document classification device, and a restrictor that receives the search results and outputs narrowed search results. This section of MATSUDA does not disclose or even remotely suggest URLs or identifying parameter combinations in a URL. Therefore, this section of MATSUDA cannot disclose or suggest identifying a parameter combination from the plurality of URLs that corresponds to content that is approximately the same as the content corresponding to the first URL, as recited in claim 1.

Applicants also wish to address col. 9, line 56 to col. 10, line 34 of MATSUDA.

This section of MATSUDA discloses the fifth embodiment of the invention of MATSUDA, and is the only section of MATSUDA that discloses URLs. The fifth embodiment of MATSUDA is directed to a feature extracting section that extracts URL information from a HTML document and determines the type of the document, allowing a more detailed classification than using keywords alone. Lines 13-33 of col. 10 of MATSUDA specifically disclose:

When the url is "http://www.ΔΔ.co.jp/Products/PC.times..times.NX/index.html", ". ΔΔ." is bound to "name", "co" is bound to "organization", "jp" is bound to "nation", "Products/PCxxNX" is bound to "path", and "index.html" is bound to "file". Thus, FIG. 14 shows the rules for the three types, that is, "product catalog", "laboratory", and "link collection."

The structural feature extracting section 110 starts the URL structural feature extracting section 115, extracts the URL information of the HTML document, and sends it to the verifier 120. For example, when the URL of the HTML document is the example described above, the bound items are extracted as the URL information. The verifier 120 verifies the features, which are sent from the structural feature extracting section 110, according to the rules in the structural feature rule base 130. In the rules listed in FIG. 14, the verifications according to three rules are successful. According to the calculation process similar to that in the first embodiment, "product catalog" scores 8 points, "laboratory" scores zero points, and "link collection" scores zero points. The relevance to "product catalog" is 100% (8/8x100), the relevance to "laboratory" is 0% (0/2x100), and the relevance to "link collection" is 0% (0/10x100).

This section of MATSUDA discloses an example, in which different parts of a URL are classified in such categories as name, organization, nation, path, file, product catalog, laboratory, and link collection. The document is then classified based on these categories. This section of MATSUDA does not disclose or suggest identifying any parameter combination from a plurality of URLs. Furthermore, even if, for the sake of argument, it is assumed that the features extracted from the URLs can be reasonably interpreted as parameter combinations, a point Applicants do not concede, this section of MATSUDA does not disclose or suggest associating these features with any content or comparing content associated with any of the URLs which are analyzed by the extractor.

Therefore, this section of MATSUDA cannot disclose or suggest identifying a parameter combination from the plurality of URLs that corresponds to content that is approximately the same as the content corresponding to the first URL, as recited in claim 1.

For at least the foregoing reasons, Applicants submit that claim 1 is not anticipated by MATSUDA. Accordingly, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. 102(e) based on MATSUDA be reconsidered and withdrawn.

Claims 2-6 depend from claim 1. Therefore, these claims are not anticipated by MATSUDA for at least the reasons set forth above with respect to claim 1. Accordingly, Applicants respectfully request that the rejection of claims 2-6 under 35 U.S.C. 102(e) based on MATSUDA be reconsidered and withdrawn. Moreover, these claims are not anticipated by MATSUDA for reasons of their own.

For example, claim 2 recites that the different parameter combinations include a first URL with no parameters, a first URL with each of the one or more parameters individually, and a first URL with combinations of the one or more parameters. The Examiner relies on col. 2, lines 59-64 of MATSUDA for allegedly disclosing this feature (Office Action, p. 3). Applicants disagree with the Examiner's interpretation of MATSUDA.

Col. 2, lines 59-64 of MATSUDA disclose:

Instead of the restrictor, the system may have a separator for receiving the search results from the search engine, receiving the relevance of the structured document found by the type searcher, grouping the found documents according to their relevance to the input type, and outputting the search results to the input/output device.

This section of MATSUDA discloses a separator for grouping search results according to their relevance to the input type and outputting the results. This section of MATSUDA does not disclose or even remotely suggest URLs or identifying parameter combinations in a URL. Therefore, this section of MATSUDA cannot disclose or suggest that the different parameter combinations include a first URL with no parameters, a first URL with each of the one or more parameters individually, and a first URL with combinations of the one or more parameters, as recited in claim 2.

For at least these additional reasons, claim 2 is not anticipated by MATSUDA.

Independent claim 7 is directed to a method for converting a uniform resource locator (URL) into a canonical form of the URL, that includes receiving a URL that refers to content and that includes a parameter set including at least one parameter, determining a rewrite rule by receiving a plurality of URLs that include the parameter set and identifying parameters in the parameter set that do not contribute to content, applying the rewrite rule to the URL by removing the parameters that do not contribute to content from the URL, and outputting the rewritten URL as the canonical form of the URL. MATSUDA does not disclose or suggest this combination of features.

For example, MATSUDA does not disclose or suggest determining a rewrite rule by receiving a plurality of URLs that include the parameter set and identifying parameters in the parameter set that do not contribute to content, as recited in claim 7. The Examiner relies on col. 2, lines 43-59 of MATSUDA for allegedly disclosing the above feature (Office Action, p. 6). Applicants disagree with the Examiner's interpretation of MATSUDA.

Col. 2, lines 43-59 of MATSUDA were reproduced above. This section of MATSUDA discloses a structured document search system that includes an input/output device, a search engine, a type searcher that uses a structured document classification device, and a restrictor that receives the search results and outputs narrowed search results. This section of MATSUDA does not disclose or suggest URLs. This section of MATSUDA also does not disclose or suggest identifying parameters in a parameter set that do not contribute to content. Therefore, this section of MATSUDA cannot disclose or suggest determining a rewrite rule by receiving a plurality of URLs that include the parameter set and identifying parameters in the parameter set that do not contribute to content, as recited in claim 7.

For at least the foregoing reasons, claim 7 is not anticipated by MATSUDA. Accordingly, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. 102(e) based on MATSUDA be reconsidered and withdrawn.

Claims 9-11 depend from claim 7. Therefore, these claims are not anticipated by MATSUDA for at least the reasons set forth above with respect to claim 1. Accordingly, Applicants respectfully request that the rejection of claims 9-11 under 35 U.S.C. 102(e) based on MATSUDA be reconsidered and withdrawn.

Independent claim 12 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 7. Therefore, this claim is not anticipated by MATSUDA for at least reasons similar to the reasons set forth above with respect to claim 7. Accordingly, Applicants respectfully request that the rejection of claim 12 under 35 U.S.C. 102(e) based on MATSUDA be reconsidered and withdrawn.

Claims 14-16 depend from claim 12. Therefore, these claims are not anticipated by MATSUDA for at least the reasons set forth above with respect to claim 12.

Accordingly, Applicants respectfully request that the rejection of claims 14-16 under 35 U.S.C. 102(e) based on MATSUDA be reconsidered and withdrawn.

Independent claims 17 and 18 recite features similar to, yet possibly of different scope than, features recited above with respect to claim 1. Therefore, these claims are not anticipated by MATSUDA for at least reasons similar to the reasons set forth above with respect to claim 1. Accordingly, Applicants respectfully request that the rejection of claims 17 and 18 under 35 U.S.C. 102(e) based on MATSUDA be reconsidered and withdrawn.

New claims 19 and 20 depend from claims 17 and 18, respectively. Therefore, these claims are patentable over the art of record for at least the reasons set forth above with respect to claim 17 and 18.

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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